

E. KENT WINWARD #5562
ABRAHAM SMOOT #12666
Attorney for Debtor(s)
4850 Harrison Blvd, Suite 1
Ogden UT 84403
Telephone: (801) 392-8200
Facsimile: (801) 392-2724
utahbankruptcyfirm@gmail.com

IN THE UNITED STATES BANKRUPTCY COURT
District of Utah

In the Matter of:

Case No. 17-20039

Jennifer Atkinson,

Chapter 13

Debtor(s)

Judge Joel T. Marker

OBJECTION TO DISMISSAL AND FOR ATTORNEY FEES

Debtor, through counsel, hereby objects to the Trustee's Motion to Dismiss. In support thereof, debtor represents as follows:

1. Debtor filed a Chapter 13 petition on January 4, 2017.

2. Based upon information received from the Debtor, the plan payment will be brought current within the next thirty days or the case will be converted to Chapter 7. Counsel has discussed the matter with the Debtor and informed them that if the payments are not brought current or converted to Chapter 7, the case will be dismissed.

3. Counsel is seeking fees in the amount of \$199.00 as an administrative expense.

WHEREFORE, Debtor requests that the Trustee's Motion to Dismiss be denied and attorney fees granted.

DATED: August 27, 2018

_____/s/_____
E. Kent Winward
Abraham Smoot
Attorneys for Debtor